



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**VIA UPS**

Mr. Steve Weems  
Environmental Services Technician  
Mount Joy Wire Corporation  
1000 E. Main Street  
Mount Joy, PA 17552

NOV 17 2016

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Mount Joy Wire Corporation

**Information Request - Reference No. C17-002**  
**EPA ID No. PAD003023371**

Dear Mr. Weems:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information from Mount Joy Wire Corporation to supplement the information obtained by EPA during the inspection of the manufacturing facility located in Mount Joy, PA (herein after referred to as "Mount Joy" or the "Facility") on June 9, 2016. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes . . . ." EPA hereby requires that you furnish to EPA, within **thirty (30) calendar days** of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to

this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the person(s) who prepared the original and the date the document became effective at the Facility.

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266 and 268 shall have the meanings set forth therein.

#### Requested Information

1. During the June 9, 2016 EPA inspection, spent borax coating liquid was accumulated in open containers at the time of the inspection. Please refer to Photo #47 of the EPA Compliance Evaluation Inspection ("CEI") report which is enclosed as Attachment A of this letter. According to Facility personnel, the spent borax coating baths are evaporated, and the resulting solids are sent offsite as non-hazardous waste. Please provide the following information regarding the content of the containers seen in Photo #47:
  - a. Provide a detailed description of the process or processes that generated the content(s) of each container, and provide all Safety Data Sheets ("SDSs") and/or Material Safety Data Sheets ("MSDSs") for products used in the process that generated the contents of each container.
  - b. Provide a detailed description of the content(s) of each container.
  - c. Provide the date on which the content(s) of each container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year, and explain the basis for such an estimate.
  - d. Provide the date on which the content(s) of each container was first placed into the container and state the basis of your knowledge. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate.
  - e. Please state the amount (weight and volume) of material in each container at the time of the EPA inspection.
  - f. Please state the volume of each container.



- g. State the exact date when each container was moved to the 90-Day Area. If an exact date cannot be determined, estimate month and year, and explain the basis for such an estimate.
  - h. State whether or not a “waste determination” and “LDR determination” were made for the content(s) of each container.
  - i. If a “waste determination” was made for the content(s) of each container, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - j. Was the content(s) of each container determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content(s) of each container that was determined to be hazardous waste.
  - k. If the content(s) of each container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
  - l. If the content(s) of each container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
2. During the EPA CEI of the Rod Mill Area, the EPA inspector observed a maintenance cart with aerosol can products in use by the Facility. Please refer to Photo #2 of the Photographic Log included with Attachment A. The EPA inspectors observed different types of aerosol can products on the maintenance cart, which included compressed air, contact cleaner, paint and primer, and lubricant. According to Facility personnel, spent aerosol cans are collected in a container located in the 90-Day Area, and are then sent offsite for recycling. With respect to the Facility’s aerosol can use and management, please answer the following:
- a. Please provide a detailed description of the process or processes which utilize aerosol can products at the Facility.
  - b. Submit the SDSs and/or MSDSs for each of the aerosol can products used by the Facility.
  - c. Does the Facility maintain a designated accumulation receptacle for used aerosol cans that are generated throughout the Facility? If so, please (i) state when this designated receptacle for used aerosol cans was first put into service, (ii) submit photographs of such receptacle, and (iii) clearly identify the location of such receptacle at the Facility via a site map.
  - d. Please state whether a “waste determination” and “LDR determination” have been made for each used aerosol can generated throughout the Facility.

- e. If a “waste determination” and “LDR determination” have been made for the Facility’s used aerosol can waste stream, state when such determinations were made.
  - f. Were any of the Facility’s used aerosol cans determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste.
  - g. If a hazardous waste determination was made, state whether the hazardous waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for such determination, and provide any supporting documentation.
  - h. Please provide a detailed narrative explaining how the Facility manages its used aerosol can waste stream from the time it is generated until it is shipped off-site.
  - i. If the Facility’s used aerosol can waste stream has been disposed of in the regular trash, please provide the name, address, and phone number of the municipal landfill that has been receiving the Facility’s used aerosol can waste stream. In addition, please submit copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of the used aerosol cans from January 1, 2012 to the present.
  - j. If the Facility’s used aerosol can waste stream has been shipped off-site to a RCRA permitted treatment, storage and/or disposal (TSD) facility, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of the used aerosol cans from January 1, 2012 to the present.
  - k. If the Facility’s used aerosol can waste stream has been shipped off-site to any other entity for recycling, provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied the off-site shipment of the used aerosol cans from January 1, 2012 to the present.
3. During the June 9, 2016 EPA CEI, under the zinc phosphate coating line the EPA inspector observed solid material accumulated in the secondary containment under the process tank. Please refer to Photo #14 and Photo #15 of the Photographic Log included with Attachment A. Facility personnel indicated that solids accumulated in the secondary containment under the zinc phosphate coating tank are managed onsite and sent offsite as hazardous waste. Please provide the following information regarding the material under the coating line, as seen in Photo #14 & Photo #15:
- a. Provide a detailed description of the process or processes that generated the material under the coating tank, and please provide a detailed description of the material.



- b. Provide a detailed description of the material under the coating tank.
  - c. Provide the date on which the material was generated into the secondary containment, and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year.
  - d. Please state the amount (weight and volume) of material accumulated in the secondary containment at the time of the inspection.
  - e. State whether or not a “waste determination” and “LDR determination” were made for the material in the secondary containment.
  - f. If a “waste determination” was made, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - g. Was the material in the secondary containment determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the material that was determined to be hazardous waste.
  - h. If the material in the secondary containment was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied the off-site shipment of the waste.
  - i. If the material in the secondary containment remains on-site, please state where the material is currently located within the Facility and how the material is currently being managed.
  - j. Indicate how often such material enters the secondary containment. If an exact amount of time cannot be determined, please estimate on average, how often (daily, weekly, monthly), and explain the basis for such estimate.
  - k. Indicated how often material is removed from below the secondary containment, and describe in detail, how the material is removed. If an exact amount of time cannot be determined, please estimate on average, how often (daily, weekly, monthly), and explain the basis for such estimate.
4. During the June 9, 2016 EPA CEI, the EPA inspectors observed 7 containers in the 90-Day Area that were stacked on a wooded pallet. Please refer to Photo #31 of the EPA CEI report which is enclosed as Attachment A of this letter. Two of the containers were labeled as “Temp Lead + Fire Brick” and dated as “11/25/08.” Three of the other containers were dated as “4/1/13”, “4/2/13”, and “11/25/08.” Please provide the following information regarding the content(s) of each of the 7 containers:
- a. Provide a detailed description of the process or processes that generated the content(s)

of each container, and please provide a detailed description of the content(s) of each container.

- b. Provide the date on which the content(s) of each container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year, and explain the basis for such an estimate.
- c. Provide the date on which the content(s) of each container was first placed into the container and state the basis of your knowledge. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate.
- d. Please state the amount (weight and volume) of material in each container at the time of the EPA CEI.
- e. State whether or not a "waste determination" and "LDR determination" were made for the content(s) of each container.
- f. If a "waste determination" was made for the content(s) of each container, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
- g. Was the content(s) of each container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with the content(s) of each container that was determined to be hazardous waste.
- h. If the content(s) of each container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
- i. If the content(s) of each container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.

5. During the June 9, 2016 EPA CEI, the EPA inspectors observed 5 open containers in the 90-Day Area that were open, unlabeled, undated, and stacked on pallets. Please refer to Photo #34 and Photo #35 of the EPA CEI report which is enclosed as Attachment A of this letter. Please provide the following information regarding the content(s) of each container:

- a. Provide a detailed description of the process or processes that generated the content(s) of each container, and please provide a detailed description of the content(s) of each container.
- b. Provide the date on which the content(s) of each container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year, and explain the basis for such an estimate.



- c. Provide the date on which the content(s) of each container was first placed into the container and state the basis of your knowledge. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate.
  - d. Please state the amount (weight and volume) of material in each container at the time of the EPA inspection.
  - e. State whether or not a "waste determination" and "LDR determination" were made for the content(s) of each container.
  - f. If a "waste determination" was made for the content(s) of each container, state whether the waste determination was based on analytic results or on the generator's knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator's knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - g. Was the content(s) of each container determined to be "hazardous waste?" If so, please state the specific EPA Hazardous Waste Code(s) associated with the content(s) of each container that was determined to be hazardous waste.
  - h. If the content(s) of each container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
  - i. If the content(s) of each container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
6. During the June 9, 2016 EPA CEI, the EPA inspectors observed 5 partially filled containers in the 90-Day Area that were accumulated on pallets. Please refer to Photos #44 through #46 of the EPA CEI report which is enclosed as Attachment A of this letter. At the time of the inspection, some of the containers were labeled as non-hazardous waste. Facility personnel were unsure of the contents of each container. Please provide the following information regarding the content(s) of each container:
- a. Provide a detailed description of the process or processes that generated the content(s) of each container, and please provide a detailed description of the content(s) of each container.
  - b. Provide the date on which the content(s) of each container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year, and explain the basis for such an estimate.
  - c. Provide the date on which the content(s) of each container was first placed into the container and state the basis of your knowledge. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate.

- d. Please state the amount (weight and volume) of material in each container at the time of the EPA inspection.
  - e. State whether or not a “waste determination” and “LDR determination” were made for the content(s) of each container.
  - f. If a “waste determination” was made for the content(s) of each container, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - g. Was the content(s) of each container determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content(s) of each container that was determined to be hazardous waste.
  - h. If the content(s) of each container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
  - i. If the content(s) of each container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed.
7. During the June 9, 2016 EPA CEI, the EPA inspector observed 6 totes that were partially filled with an unidentified material. Please refer to Photos #56 and #57 of the EPA CEI report which is enclosed as Attachment A of this letter. The totes were not labeled to identify the contents of the containers, and the totes were not dated with an accumulation start date. Please provide the following information regarding the content(s) of each tote:
- a. Provide a detailed description of the process or processes that generated the content(s) of each container, and please provide a detailed description of the content(s) of each container.
  - b. Provide the date on which the content(s) of each container was generated and state the basis of your knowledge. If an exact date cannot be determined, please estimate the generation month and year, and explain the basis for such an estimate.
  - c. Provide the date on which the content(s) of each container was first placed into the container and state the basis of your knowledge. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate.
  - d. Please state the amount (weight and volume) of material in each container at the time of the EPA inspection.



- e. State whether or not a “waste determination” and “LDR determination” were made for the content(s) of each container.
  - f. If a “waste determination” was made for the content(s) of each container, state whether the waste determination was based on analytic results or on the generator’s knowledge of the process that generated the waste. If the determination was based on analytical results, provide any and all documentation of such results. If the determination was based upon the generator’s knowledge, provide a narrative explanation of the scientific basis for each such determination, and provide any supporting documentation.
  - g. Was the content(s) of each container determined to be “hazardous waste?” If so, please state the specific EPA Hazardous Waste Code(s) associated with the content(s) of each container that was determined to be hazardous waste.
  - h. If the content(s) of each container was shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
  - i. If the content(s) of each container still remains on-site, please state where such contents are currently located within the Facility and how such contents are currently being managed
8. During the June 9, 2016 EPA CEI, the EPA inspector observed two open and undated containers of universal waste lamps accumulated in the 90-Day Area. Please refer to Photo #53 of the EPA CEI report which is enclosed as Attachment A of this letter. Please provide the following information regarding the spent universal waste lamps:
- a. Provide the name of the manufacturer and the model number of each electric lamp accumulated in the containers located in the 90-Day Area at the time of the EPA inspection.
  - b. State the exact date when each universal waste lamp was generated. If an exact date cannot be determined, estimate month and year, and explain the basis for such an estimate.
  - c. State the exact date when each universal waste lamp was placed into the plastic container. If an exact date cannot be determined, estimate month and year, and explain the basis for such an estimate.
  - d. State the exact date when each universal waste lamp was moved to the 90-Day Area. If an exact date cannot be determined, estimate month and year, and explain the basis for such an estimate.
  - e. State whether a waste determination has been conducted for each type of used lamp.
  - f. Provide the results of each waste determination performed or relied upon by the Facility for the purpose of managing and disposing of the used lamps.

- g. Include all information on which such waste determinations were based including, but not limited to, knowledge of the hazardous characteristics of the waste, SDSs or MSDSs, results of chemical or physical analyses, and any other information used to make such waste determination.
  - h. If the universal waste lamps were shipped off-site, submit copies of all bills of lading, manifests (hazardous and non-hazardous), shipping invoices, and LDR notices/certifications that accompanied each off-site shipment of the waste.
  - i. If the universal waste lamps still remain on-site, please state where the lamps are currently located within the Facility, and describe, in detail, how the lamps are currently being managed.
9. During the inspection of the Machine Shop, the EPA inspector observed an access area for the Facility's onsite storage tank. Please refer to Photo #62 of the EPA CEI report which is enclosed as Attachment A of this letter. According to Facility personnel, the tank stores fuel oil that is used to back-up the Facility onsite boilers. Please provide the following information regarding the underground storage tank:
- a. Describe, in detail, the material stored in the tank, and provide a SDS or MSDS for the material.
  - b. Is the material (stated in your response to Question 9.a. above) stored in the tank used on premise for a boiler or is it connected to an emergency generator?
10. With respect to the Facility's hazardous waste training program:
- a. Provide the first and last name of each employee at the Facility who is or has been responsible for the handling and/or management of hazardous waste for the time period of January 1, 2012 up to the present. This would include, but not be limited to, persons responsible for the labeling, dating, inspecting, and transporting containers of hazardous waste, in addition to the signing of manifests and LDR notices, waste determinations, emergency coordinators, and hazardous waste training instructors.
  - b. Provide the exact dates of employment for each of the employee names provided in your response to Question 10.a. above.
11. Please state "yes" or "no" to the following question: Does the Facility maintain documentation specifying the job title and job description for each employee listed in response to Question 10.a? If "yes", please answer the following:
- a. Submit the Facility's documented job titles and written job descriptions for each employee listed in response to Question 10.a. for the time period of January 1, 2012 up to the present.
  - b. For each document submitted in response to Question 11.a, above, provide the date each such document was first created by the Facility.



12. Please state “yes” or “no” to the following question: Has the Facility provided initial hazardous waste training to each employee listed in response to Question 10.a? If “yes”, please answer the following:
- a. Provide the dates on which initial hazardous waste training was conducted for each of the employees listed in response to Question 10.a. for the time period of January 1, 2012 up to the present and state the basis of your knowledge.
  - b. Submit any and all records the Facility has maintained to document initial hazardous waste training has been conducted for each employee named in response to Question 10.a. for the time period of January 1, 2012 up to the present.
13. Please state “yes” or “no” to the following question: Has the Facility provided annual refresher hazardous waste training to each employee listed in response to Question 10.a? If “yes”, please answer the following:
- a. Provide the dates on which annual refresher hazardous waste training was conducted for each of the employees listed in response to Question 10.a. for the time period of January 1, 2012 up to the present and state the basis of your knowledge.
  - b. Submit any and all records the Facility has maintained to document annual fresher hazardous waste training has been conducted for each employee named in response to Question 10.a. for the time period of January 1, 2012 up to the present.
14. During the June 9, 2016 EPA CEI, Facility personnel stated that spent acid generated from the Facility’s acid pickling process tanks located in the Clean House area and TLP area are transferred into two tanks located in the tank farm: Tank 007A and Tank 008A. Facility personnel also stated that spent pickling acid is sent offsite for reuse. Please provide the following information regarding the Facility’s spent pickling acid waste stream that is accumulated in Tank 007A and Tank 008A:
- a. If the Facility’s pickling acid has been sent offsite for reuse, please provide the name, address, and phone number of each entity that received the Facility’s pickling acid waste stream. In addition, please submit copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, LDR notices, and any certifications of reuse that accompanied the off-site shipment of the pickling acid that went for reuse from January 1, 2014 to the present.
  - b. If the Facility’s pickling acid waste stream has been shipped off-site to a RCRA permitted TSD facility for disposal, indicate the date each shipment was made, and provide copies of all bills of lading, manifests (including hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied each off-site shipment of the pickling acid that went for disposal from January 1, 2014 to the present.

A copy of the June 9, 2016 inspection report documenting the findings of the inspector is enclosed as Attachment A for your information, and includes only those attachments not provided by the facility representative(s) at the time of or subsequent to the inspection.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

With regard to the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"), please see the "Information for Small Businesses" memo, enclosed as Attachment B, which might be applicable to your facility. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve your facility of its obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue an enforcement action. To preserve your facility's legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement actions. EPA has not made a determination as to whether or not your facility is covered by SBREFA.

Your facility is entitled to assert a claim of business confidentiality covering any part or all of the information submitted, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to your facility.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_



Please send your response to:

Andrew Ma  
US EPA Region III  
Environmental Science Center  
701 Mapes Road  
Fort Meade, MD 20755-5350

If you have any questions concerning this matter, please contact Mr. Andrew Ma at (410) 305-3429.

Sincerely,

A handwritten signature in cursive script that reads "Carol Amend".

Carol Amend, Associate Director  
Land and Chemicals Division  
Office of Land Enforcement

Enclosures

cc: A. Ma (3LC70) w/o